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6 Attorney for Defendant
BACKGROUNDCHECKS.COM LLC
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 JORGE OCHOA, JR.,

11 Plaintiff,

12 v.

13 NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC., AT&T
14 MOBILITY, LLC, DISK NETWORK, LLC
DIRECTV, LLC and
15 BACKGROUNDCHECKS.COM LLC,

16 Defendants.
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Case No. 2:22-cv-01430-ART-DJA

**STIPULATION TO EXTEND TIME FOR
DEFENDANT
BACKGROUNDCHECKS.COM LLC TO
FILE RESPONSIVE PLEADING TO
PLAINTIFF'S COMPLAINT**

[FIRST REQUEST]

18 Plaintiff JORGE OCHOA, JR. ("Plaintiff") and Defendant BACKGROUNDCHECKS.COM
19 LLC ("Defendant"), by and through their undersigned counsel, hereby agree and stipulate to extend
20 the time for Defendant to file a response to the Complaint from the current deadline of December 27,
21 2022, up to and including **January 26, 2023**.

22 The requested extension is necessary in light of the fact that Defendant's counsel was recently
23 retained. The additional time will allow defense counsel to conduct a complete investigation into the
24 allegations and to prepare a response to the Complaint.

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1 This is the first request for an extension of time to respond to the Complaint. This request is
2 made in good faith and not for the purpose of delay.

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4 Dated: December 27, 2022

Dated: December 27, 2022

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Michael Kind

8 MICHAEL KIND, ESQ.
KIND LAW

/s/ Diana G. Dickinson

DIANA G. DICKINSON, ESQ.
LITTLER MENDELSON, P.C.

9 GEORGE HAINES, ESQ.
10 GERARDO AVALOS, ESQ.
FREEDOM LAW FIRM, LLC

Attorney for Defendant
BACKGROUNDCHECKS.COM LLC

11 *Attorneys for Plaintiff*
JORGE OCHOA, JR.

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13 **IT IS SO ORDERED.**

14 Dated: December 29, 2022

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18 UNITED STATES MAGISTRATE JUDGE

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